

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

IN RE:	§	
KENNETH J. SAMANSKY	§	
xxx-xx-8594	§	CASE NO. 13-41306
3001 N. TRINITY	§	
DENTON, TX 76208	§	CHAPTER 13
	§	
Debtor		

**MOTION FOR APPROVAL OF POST-PETITION ADMINISTRATIVE FEE**

TO THE HONORABLE JUDGE OF SAID COURT:

**NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AND SERVED UPON THE PARTY FILING THIS PLEADING WITHIN TWENTY-ONE (21) DAYS FROM THE DATE OF SERVICE UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH REQUESTS FOR HEARING. IF NO RESPONSE IS TIMELY SERVED AND FILED, THIS PLEADING SHALL BE DEEMED TO BE UNOPPOSED AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. IF A OBJECTION IS FILED AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SET A HEARING. IF YOU FAIL TO APPEAR AT THE HEARING, YOUR OBJECTION MAY BE STRICKEN. THE COURT RESERVES THE RIGHT TO SET A HEARING ON ANY MATTER.**

COMES NOW, Barron and Barron, L.L.P., by and through Robert E. Barron, attorney of record in the above-styled bankruptcy case and herewith files this Motion for Approval of Post-Petition Administrative Fee and in support would show the Court as follows:

1. Kenneth J. Samansky, Debtor, filed a Chapter 13 bankruptcy on May 22, 2013.
2. On June 12, 2014, the Debtor retained Barron and Barron, L.L.P. to file a Motion to Sell Real Estate. The agreed upon fixed fee was \$650.00. Barron and Barron, L.L.P. received said fee which was placed in a trust account pending approval by the Court.
3. For this fixed fee, Barron and Barron, L.L.P. will prepare and file a Motion to Sell Real Estate, prepare and file a Witness and Exhibit List, and prepare and file a Motion for

Approval of Post-Petition Administrative Fee. In addition, the fixed fee includes letter and/or telephone conferences with the Debtor(s) regarding Debtor(s) position, reviewing the Debtors' records, reviewing the creditor's records, telephone conferences with the creditor and/or their attorneys, reviewing possible settlement, reviewing the agreed order, and possible trial if a settlement can not be reached.

4. Since Barron and Barron, L.L.P. has or will shortly substantially complete all of the legal services required for the Motion to Sell Real Estate, Barron and Barron, L.L.P. seeks approval to withdraw the post-petition administrative fee from the trust account.

WHEREFORE, PREMISES CONSIDERED, Barron and Barron, L.L.P., respectfully prays that this Court approve the Motion for Approval of Post-Petition Administrative Fee and for such other and further relief, both general and specific, at law or in equity, to which the Debtor may show justly entitled.

Dated: July 23, 2014

Respectfully submitted,

BARRON AND BARRON, L.L.P.  
P.O. Box 1347  
Nederland, TX 77627  
409-727-0073

By: /s/ Robert E. Barron  
Robert E. Barron  
SBN: 01820800  
Attorney for Debtor

CERTIFICATE OF SERVICE

I hereby certify that on July 23, 2014, a true and correct copy of the Motion for Approval of Post-Petition Administrative Fee shall be served via electronic means, if available, otherwise by regular, first class mail, to the following, and to the parties on the attached mailing matix. This service complies with Local Rules of Bankruptcy Procedure 9013(f).

**Kenneth J. Samansky**

P.O. Box 1551  
Denton, TX 76202

**Janna L. Countryman**

P. O. Box 941166  
Plano, TX 75094-1166

**Bank of America, N.A.**

c/o Chelsea Marie Schneider  
14160 North Dallas Parkway, Suite 900  
Dallas, TX 75254

**Toyota Motor Credit Corporation**

c/o Stephen G. Wilcox  
P.O. Box 11509  
Fort Worth, TX 76110-0509

**US Trustee**

Office of the U.S. Trustee  
110 N. College Ave., Suite 300  
Tyler, TX 75702

/s/ Robert E. Barron  
ROBERT E. BARRON

Label Matrix for local noticing

ASSET ACCEPTANCE LLC

AT &amp; T

0540-4

PO BOX 2036

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c/o AFNI, Inc.

Case 13-41306

WARREN, MI 48090-2036

POB 3517

Eastern District of Texas

Bloomington, IL 61702-3517

Sherman

Wed Jul 23 11:06:19 CDT 2014

Ace Cash

Affiliated Pathologists

Affiliated Pathologists

8010 Spring Valley Road

POB 1867

c/o Credit Systems

Dallas, TX 75240-3848

Denton, TX 76202-1867

POB 1088

Arlington, TX 76004-1088

Asset Acceptance

Atmos Energy

Bank of America

POB 1630

P.O. Box 790311

7105 Corporate Dr.

Warren, MI 48090-1630

Saint Louis, MO 63179-0311

Plano, TX 75024-4100

Bank of America, N.A.

Bankcard Services

Robert E. Barron

4500 PARK GRANADA

POB 4477

P.O. Box 1347

CALABASAS, CA 91302-1613

Beaverton, OR 97076-4401

Nederland, TX 77627-1347

Barron &amp; Barron, LLP

Baylor Medical Center

Baylor Medical Center

P.O. Box 1347

5601 Warren Pkwy.

c/o MNET Financial

Nederland, Texas 77627-1347

Frisco, TX 75034-4069

95 Argonaut #280

Aliso Viejo, CA 92656-4140

Baylor Medical Ctr

Baylor Medical Ctr.

Baylor Medical-Carrollton

PO Box 951970

c/o DRS Collections

c/o Creditors Bankruptcy Service

Dallas, TX 75395-1970

800 E. Campbell #399

P.O. Box 740933

Richardson, TX 75081-1862

Dallas, TX 75374-0933

Big D Lumber

Bluegreen Corp

COSERV

301 S. Interurban St.

4960 Conference Way

C/O Credit Systems Intl.

Richardson, TX 75081-4183

Boca Raton, FL 33431-4413

1277 Country Club Ln.

Fort Worth, TX 76112-2304

(p)CAPITAL ONE

Cavalry Portfolio Services

Central Financial Control

PO BOX 30285

500 Summit Lake Drive, Ste 400

PO Box 66051

SALT LAKE CITY UT 84130-0285

Valhalla, NY 10595-2322

Anaheim, CA 92816-6051

Chase

Chase

Chase

POB 15298

c/o Midland Funding

c/o Northstat Location Services

Wilmington, DE 19850-5298

8875 Aero Dr. Ste. 200

4285 Genesee St.

San Diego, CA 92123-2255

Cheektowaga, NY 14225-1943

Citi Shell

Citibank

Citifinancial

PO Box 6497

c/o FCF Services

605 Mann Road

Sioux Falls, SD 57117-6497

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Fort Mill, SC 29715-8421

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Page 6 of 8

Credit Protection  
13355 Noel Rd. 21st Floor  
Dallas, TX 75240-6837

(p)DISCOVER FINANCIAL SERVICES LLC  
PO BOX 3025  
NEW ALBANY OH 43054-3025

Discover  
c/o Capital Mgmt  
726 Exchange St. #700  
Buffalo, NY 14210-1464

EZ Shop #5  
10550 Walnut St.  
Dallas, TX 75243-5346

Enhanced Recovery  
8014 Bayberry Rd.  
Jacksonville, FL 32256-7412

First Convenience Bank  
POB 937  
Killeen, TX 76540-0937

Floors Unlimited  
10771 Estate Ln.  
Dallas, TX 75238-2338

HSBC  
P.O. Box 5253  
Carol Stream, IL 60197-5253

HSBC  
c/o Regent & Assoc.  
2650 Fountain View Dr.  
Houston, TX 77057-7631

Home Depot  
c/o LTD Fiancial  
7322 Southwest Fwy Ste 1  
Houston, TX 77074-2010

Home Pro  
1325 Capital Pkwy. Ste 117  
Carrollton, TX 75006-3645

Hyphen Solutions  
c/o Virtuoso Sourcing Group  
3033 S. Parker Rd. Ste. 1000  
Aurora, CO 80014-2919

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Philadelphia, PA 19101-7346

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CENTRALIZED INSOLVENCY OPERATIONS  
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PHILADELPHIA PA 19101-7346

Jefferson Capital Systems  
16 McLeland  
Saint Cloud, MN 56303-2160

Jefferson Capital Systems LLC  
PO BOX 7999  
SAINT CLOUD MN 56302-7999

Joseph Fletcher MD  
3327 Colorado Blvd. #100  
Denton, TX 76210-6866

Joseph Fletcher MD  
c/o DIF Services  
PO Box 29818  
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Kwal Paint  
6300 Independence Pkwy #E  
Plano, TX 75023-4021

Laboratory Corp of America  
POB 2240  
Burlington, NC 27216-2240

Maryland National Bank  
225 N. Calvert St.  
Baltimore, MD 21202-3504

Maxima Construction  
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Allen, TX 75013-0016

Medical Center of Lewisville  
c/o Financial Corp of America  
PO Box 203500  
Austin, TX 78720-3500

Medical Imaging of Dallas  
POB 814129  
Dallas, TX 75381-4129

NTTA  
P.O. Box 660244  
Dallas, TX 75266-0244

Northern Resolution  
P.O. Box 566  
Amherst, NY 14226-0566

Pittsburg Paint  
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Pittsburgh, PA 15237-5848

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PO BOX 41067  
NORFOLK VA 23541-1067

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Frisco, TX 75034-3082

Southwest Credit Systems  
4120 International Pkwy. Ste 1100  
Carrollton, TX 75007-1958

TXU  
PO Box 650700  
Dallas, TX 75265-0700

(p)TXU ENERGY RETAIL COMPANY LP  
CO BANKRUPTCY DEPARTMENT  
PO BOX 650393  
DALLAS TX 75265-0393

Texas Radiology  
c/o Synerprise Consulting  
POB 957  
Mission, KS 66201-0957

Texas Workforce Commission  
101 E. 15th St.  
Austin, TX 78778-0001

Title Max  
501 N. Interstate 35E Frontage Rd  
Denton, TX 76206

Touchstone of Oaktree  
1435 S. Loop 288 #101  
Denton, TX 76205-4701

Touchstone of Oaktree  
c/o Professional Finance  
5754 W. 11th Ste 100  
Greeley, CO 80634-4811

(p)TOYOTA MOTOR CREDIT CORPORATION  
PO BOX 8026  
CEDAR RAPIDS IA 52408-8026

Toyota Motor Credit Corporation (TMCC)  
PO BOX 8026  
Cedar Rapids, Iowa 52408-8026

Trinity Medical Center  
c/o Central Financial  
POB 8309B  
Birmingham, AL 35218

U.S. Attorney General  
Department of Justice  
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Washington, DC 20530-0001

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Tulsa, OK 74146-6824

Wells Fargo  
c/o Asset Acceptance  
PO Box 1630  
Warren, MI 48090-1630

Wells Fargo Bank N A  
Wells Fargo Education Financial Services  
301 E 58th Street N  
Sioux Falls SD 57104-0422

West Asset Management  
2703 N. Highway 75  
Sherman, TX 75090-2567

West Asset Management  
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PO Box 740782  
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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Capital One  
PO Box 85520  
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Discover  
POB 15316  
Wilmington, DE 19850

Internal Revenue Service  
POB 21126  
Philadelphia, PA 19114

Portfolio Recovery Associates, LLC  
POB 41067  
Norfolk VA 23541

TXU Energy  
200 W. John Carpenter Fwy.  
Irving, TX 75039

(d)TXU Energy  
P.O. Box 650638  
Dallas, TX 75265

Toyota Financial Services  
P.O. Box 5855  
Carol Stream, IL 60197

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Bank of America, N.A.

(d)Janna L. Countryman  
P. O. Box 941166  
Plano, TX 75094-1166

(u)Toyota Motor Credit Corporation

End of Label Matrix  
Mailable recipients 87  
Bypassed recipients 3  
Total 90